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May 9, 2002

27-19071.001

BROWN AND
CALDWELL

Mr. Donald Webster
Project Manager, RCRA Programs Branch
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: Responses to USEPA Comments on the Design Basis Report
Grenada Manufacturing, LLC
EPA ID No. MSD 007 037 278

Dear Mr. Webster:

As you are aware, the Design Basis Report for the referenced site was transmitted to the USEPA and Mississippi Department of Environmental Quality (MDEQ) on May 18, 2001. The USEPA provided draft comments on the report in an e-mail message dated May 23, 2001, which were then finalized in an e-mail message dated June 26, 2001. Comments were also received from the Science and Ecosystem Support Division (SESD) of the USEPA Region 4 in a memorandum dated June 8, 2001. Responses to each of those comments were transmitted to the agencies in a letter dated October 26, 2001. Additional comments from the USEPA were received in a letter dated November 14, 2001. The purpose of this letter is to respond to the comments contained in USEPA's November 14, letter addressed to Mr. Don Williams at the referenced site. In its November 14, letter the USEPA stated that most responses to previous comments are acceptable. Additional comments were received on only three responses. As such, responses to only those three comments are provided below. Each comment is repeated below in italics, followed by a response. No revisions to the Design Basis Report have been made in response to these comments.

- *EPA-R4 Comment 8. Facility Response. Acceptable.*
EPA would like to review the Health and Safety Plan proposed decontamination procedures when they become available.

Docket Number 450432

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The Health and Safety Plan (HASP) will be prepared and submitted to USEPA for review after the prime contractor for this project has been procured. The prime contractor will be responsible for the development of a HASP for the protection of their workers as well as visitors to the project site. The HASP will include a description of decontamination procedures.

- *SESD Comment, Section 3, pg 3-3: Facility Response. Acceptable.*
EPA would like to review the Health and Safety Plan proposed decontamination procedures when they become available.

The Health and Safety Plan (HASP) will be prepared and submitted to USEPA for review after the prime contractor for this project has been procured. The prime contractor will be responsible for the development of a HASP for the protection of their workers as well as visitors to the project site. The HASP will include a description of decontamination procedures.

- *SESD Comment, Section 7, pg 7-1: Facility Response. Unacceptable.*
Because chromium VI is a constituent of concern for groundwater at the entire site, it must be included in regular monitoring at the permeable reactive barrier. Any other metals detected above MCLs, such as Arsenic and Lead must be included as well. VOCs including daughter products of the breakdown of TCE and Toluene must also be included in the regular monitoring program, as well as the organic constituents listed on Table 2-1 in the RFI Report. The Semi-VOCs including the constituents listed on Table 2-3 in the RFI Report may be included on a less frequent basis, for example, semiannually. The regular monitoring program must be at least quarterly.

The list of constituents of concern and corresponding frequency of monitoring will be identified in the Performance Monitoring Plan, which is in development and will be submitted to USEPA for review and approval once it is completed. It is anticipated that certain SVOCs and metals may be included in the less frequent monitoring program (e.g., semi-annual monitoring) due to their relatively low levels detected in groundwater as well as their location with respect to the location of the permeable reactive barrier. Metals detected above their respective MCL, organic constituents listed in Table 2-1 in the RFI Report, and primary constituents' daughter products will be included in the more frequent monitoring (e.g., quarterly monitoring).

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We hope that this letter has been responsive to your needs. Please feel free to contact me at (615) 250-1241 if you have any questions.

Sincerely,

BROWN AND CALDWELL



Dale Showers, P.E.
Project Manager
Design & Solid Waste

cc: Louis Crawford, MDEQ
Don Williams, Grenada Manufacturing
John Bozick, ArvinMeritor
Robert Ash IV, P.E., Brown and Caldwell